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7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 ***

11 IEHAB HAWATMEH, individually;)
YASMEEN HAWATMEH, individually;)
12 LAYTH HAWATMEH, individually; and)
IEHAB HAWATMEH, as Administrator of the)
13 ESTATE OF JOSEPH HAWATMEH,)
deceased,)
14)
Plaintiff,)
15 vs.)
16 CITY OF HENDERSON, et al. ,)
17 Defendants.)
_____)

Case No. 2:22-cv-01786-APG-DJA

18
19 **STIPULATION TO EXTEND**
TIME TO RESPOND TO MOTION TO DISMISS
20 **(First Request)**

21 COMES NOW, Plaintiffs, IEHAB HAWATMEH; YASMEEN HAWATMEH; LAYTH
22 HAWATMEH; and IEHAB HAWATMEH, as Administrator of the ESTATE OF JOSEPH
23 HAWATMEH, and Defendants, CITY OF HENDERSON; CITY OF HENDERSON POLICE
24 DEPARTMENT; THEDRICK ANDRES; LIEUTENANT THOMAS CHIELLO; SERGEANT
25 JAIME SMITH fka SERGEANT JAIME CLEAR; SERGEANT SETH VAN BEVEREN;
26 OFFICER BRETT ANDERSON; OFFICER JESSE HEHN; OFFICER JESSE LUJAN;
27 OFFICER JAMES PENDLETON; OFFICER LUIS AMEZCUA; OFFICER PHILIP DUFFY;
28 OFFICER SETH PRICE, by and through their undersigned counsel, and hereby stipulate and

1 agree as follows:

- 2 1. The Defendants hereto filed a Motion for Dismissal Pursuant to FRCP 12(b)(6) on
3 December 13, 2022 [ECF #25]. A response to said Motion is presently due on or
4 about December 27, 2022.
- 5 2. The Christmas and New Years Day holidays are rapidly approaching. Plaintiff's
6 counsel has family visiting for the holidays and various associated social
7 obligations. Plaintiffs themselves have similar obligations. In addition,
8 Plaintiff's counsel has other work obligations, including an appellate brief, that
9 will greatly reduce the time available to respond to the subject motion.
- 10 3. Based upon the foregoing, the parties respectfully request that the deadline to file
11 a response to the pending Motion to Dismiss be extended for approximately 60
12 days until February 26, 2023.
- 13 4. This Stipulation is made in good faith and not for purpose of delay.

14 Dated this 21st day of December, 2022.

15 ROGER P. CROTEAU &
16 ASSOCIATES, LTD.

MARQUIS & AURBACH

17
18 /s/ Timothy E. Rhoda
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18 /s/ Craig R. Anderson
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25 *Attorney for Defendants*

26 **IT IS SO ORDERED.**

27 By: 
28 Judge, U.S. District Court

Dated: December 26, 2022